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Ms. Magalie R. Salas
Secretary
Federal Communications Commission
Room 222
1919 M Street, NW
Washington, DC 20554

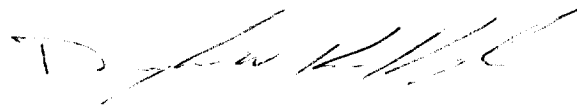
Re: Performance Measurements and Reporting Requirements for
Operations Support Systems, Interconnection, and Operator
Services and Directory Assistance
CC Docket 98-56, RM 9101

Dear Ms. Salas:

On behalf of LCI, attached is an original and four copies of the Company's initial Comments on Notice of Proposed Rulemaking concerning Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance.

One copy has been delivered to Janice Myles of the Common Carrier Bureau, and one copy has been delivered to the International Transcription Service, Inc.

Sincerely,



Douglas W. Kinkoph
Vice President, Regulatory/Legislative Affairs

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Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of)	
)	
Performance Measurements and)	CC Docket No. 98-56
Reporting Requirements)	RM-9101
For Operations Support Systems,)	
Interconnection, and Operator Services)	
And Directory Assistance)	

**COMMENTS OF LCI INTERNATIONAL TELECOM CORP.
ON NOTICE OF PROPOSED RULEMAKING**

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June 1, 1998

SUMMARY

LCI International Telecom Corp. (LCI) acknowledges the Federal Communications Commission's (FCC) diligence and untiring efforts in developing the framework in the April 17, 1998 Notice of Proposed Rulemaking (NPRM) with respect to performance measurements and reporting requirements for operations support systems (OSS), interconnection, and operator services and directory assistance. The proposed performance measurement categories would, if implemented nationally, lay the groundwork for an "apples to apples" comparison between an ILEC's provision of OSS to CLECs and its provision of such services to itself and its affiliates. While LCI applauds the FCC's accomplishments in proposing the performance measurements set forth in the NPRM, the Commission's conclusion that the best approach at this time is to provide guidelines instead of legally binding national rules falls short of what is necessary to ensure parity between the ILECs and their competitors.

LCI is convinced that the FCC should take a leadership role and promulgate national performance standards and reporting requirements to put an end to the OSS debate raging throughout the nation. Without such requirements, ILECs will be able to continue their delay in providing OSS parity, and CLECs will continue to experience frustrating problems that seriously inhibit their ability to compete, including delayed or non-existent firm order commitments, unreliable due dates for conversion of customers, chronic loss of service during such conversion, and repeated problems in the provisioning of complex orders.

As noted by the Commission in the NPRM, the ILECs have no incentive to provide quality service to their wholesale buyers because they are simultaneously competing with them in the retail market. The ILECs have demonstrated a steadfast unwillingness to cooperate in providing nondiscriminatory OSS access to CLECs, and it is therefore unreasonable to rely on voluntary compliance with model performance measurements. Although a few state commissions have started work on OSS

performance measurements and reporting requirements, many state commissions still have not done so. The Commission should not wait to see if each state acts on its own, but should instead adopt an adequate set of minimum national performance standards upon which states can build. This approach is consistent with requests from the states for guidance from the Commission.

National performance standards are the most efficient approach to ending the OSS stalemate. National standards will allow the FCC, state commissions, CLECs and ILECs to "speak the same language" on the subject of performance standards. This will ease the workload for CLECs and ILECs doing business in multiple jurisdictions and also for the FCC and the Department of Justice as they evaluate OSS compliance in the context of 271 applications.

LCI believes that an ILEC should report separately on its performance as provided to its own retail customers, its affiliates, individual competing carriers, and competing carriers in the aggregate. ILECs should submit at least monthly reports on their OSS performance to the FCC, the appropriate state commissions, and to the CLECs with which it is dealing. LCI supports the Commission's proposal for establishing a clearinghouse where ILECs would file all reports to permit efficient access to the information. Additionally, competing carriers should have access upon request to the data underlying the performance reports.

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I. Introduction

LCI International Telecom Corp. (LCI) hereby respectfully submits these comments in response to the Federal Communications Commission's (FCC's) Notice of Proposed Rulemaking released on April 17, 1998 in CC Docket No. 98-56 (NPRM). LCI acknowledges the Commission's diligence and untiring efforts in developing the framework in the NPRM with respect to performance measurements and reporting requirements for operations support systems (OSS), interconnection, and operator services and directory assistance. LCI commends the FCC's proposal with respect to the performance categories and agrees that these categories will help to clarify what measurements are necessary to determine whether an ILEC has met its duty to provide OSS on a nondiscriminatory basis as required by the Telecommunications Act of 1996 (the Act)¹ and the Commission's *First Report and Order* in CC Docket No. 96-98 (the *Order*)². LCI further believes that the categories will lay the groundwork for an "apples to apples" comparison between an incumbent local exchange carrier's (ILEC's) provision of OSS to competitive local exchange carriers (CLECs) and its provision of such services to itself and its affiliates. CLECs continue to face staggering backlogs that the ILECs do not face, as well as unacceptable error rates and delays in service and billing, which create enormous difficulties in attracting new customers and retaining existing customers.

¹ The Telecommunications Act of 1996, Pub. L. No. 104-104, 110 Stat. 56, *codified at* 47 U.S.C. §§ 151 *et. seq.*, amending the Communications Act of 1934.

² *Implementation of the Local Competition Provisions of the Telecommunications Act of 1996*, CC Docket No. 96-98, First Report and Order, 11 F.C.C. Rcd 15499 (1996) (the *Order*), *aff'd in part and vacated in part sub nom. Competitive Telecommunications Ass'n v. FCC*, 177 F.3d 1068 (8th Cir. 1997) and *Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997), *writ of mandamus issued sub nom. Iowa Utils. Bd. v. FCC*, No. 96-3321 (8th Cir. Jan. 22, 1998), *petition for cert. granted*, Nos. 97-826, 97-829, 97-830, 97-831 97-1075, 97-1087, 97-1099, and 97-1141 (U.S. Jan. 26, 1998) (collectively, *Iowa Utils. Bd.*), Order on Reconsideration, 11 F.C.C. Rcd 13042 (1996), Second Order on Reconsideration, 11 F.C.C. Rcd 19738

Unfortunately, LCI and other CLECs have been forced to rely on cumbersome, time-consuming, costly and error-prone processes for submitting orders and providing local service to their customers.

The Petition for Expedited Rulemaking, filed by LCI and CompTel on May 30, 1997 (LCI/CompTel Petition), requested that the Commission adopt appropriate minimum national performance standards for each OSS function, establish related OSS requirements, and model these performance standards on the Local Competition Users Group (LCUG) measurements. While LCI applauds the FCC's accomplishments in promulgating the performance measurements set forth in the NPRM, the Commission's conclusion that the best approach at this time is to provide guidelines instead of legally binding national rules falls short of what is necessary to ensure parity between the ILECs and their competitors.

II. Binding National Performance Standards and Reporting Requirements

A. Binding National Performance Standards and Reporting Requirements Are The Only Way to Ensure ILECs Provide Nondiscriminatory Access to OSS.

LCI submits that minimum national performance standards³ and reporting requirements are the only means to ensure that each ILEC complies with the Commission's OSS requirements. The absence of such uniform national standards and reporting requirements will continue to delay effective local competition by allowing ongoing problems, such as delayed or non-existent firm order commitments, unreliable

(1996), Third Order on Reconsideration and Further Notice of Proposed Rulemaking, FCC 97-295 (rel. Aug. 18, 1997), *further recons. pending*.

due dates for conversion of customers to LCI's service, chronic loss of service during such conversion, and repeated problems in the provisioning of complex orders. Most importantly, the adoption of national standards will finally end the OSS debate raging throughout the nation.

The Commission suggests the proposed model performance measurements and reporting requirements will promote efficient and effective communication between CLECs and ILECs, while reducing the need for regulatory oversight.⁴ This will only occur, however, if these requirements are legally binding and enforceable. Market forces in a competitive wholesale market provide wholesalers with the "necessary incentive to provide quality service to their buyers."⁵ The Commission acknowledges, however, that "[a]s the single supplier of wholesale facilities and services to competing carriers in the local market, incumbent carriers have *no such incentive*, especially given the fact that the purchasers of their wholesale offerings are also their retail customers."⁶

Given that this is the current state of the industry, the Commission should not rely on voluntary compliance by the ILECs, nor should the Commission rely on states which have limited resources. The ILECs do not now voluntarily provide information about their OSS and are not likely to do so in the future merely because the Commission adopts model rules. The ILECs have demonstrated a steadfast unwillingness to cooperate both in providing nondiscriminatory OSS access to CLECs and in providing data by which OSS

³ For the purposes of these comments, "performance standards" means measurement categories, default performance benchmarks, and measurement methodologies, collectively.

⁴ *In the Matter of Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance*, CC Docket 98-56, Notice of Proposed Rulemaking, FCC 98-71 ¶ 14 (rel. April 17, 1997) (NPRM).

⁵ *Id.* ¶ 8.

⁶ *Id.* ¶ 8 (emphasis added).

performance can be measured objectively. Furthermore, the Commission's expectation that the ILECs will voluntarily comply with the proposed model guidelines is misplaced since they have yet to provide an industry standard, application-to-application electronic interface enabling CLECs to obtain access to the functions of the incumbent's OSS at parity with the access provided to the incumbent's own retail operations. For these reasons, the Commission should develop national default performance benchmarks by which an ILEC's performance may be measured at least until the ILEC establishes measurements for its own retail operations.

The Commission also suggests that performance guidelines will provide an incentive for ILECs to provide parity because the CLECs have access to these reports.⁷ However, without binding reporting requirements, the status quo will likely remain for the ILECs' OSS operations. On the contrary, with binding reporting requirements, CLECs would be ensured the ability to detect statutory violations, and more importantly, they could assess the quality of the service they receive from an ILEC. As the Commission aptly notes, the information will also create a record should a complaint process become necessary.⁸

B. Binding National Performance Standards and Reporting Requirements Are Consistent With State Commissions' Requests for Guidance.

LCI recognizes, along with the FCC, that a few state commissions have started to generate performance measurements and reporting requirements and that some continue to conduct hearings pertaining to OSS. The adoption of minimum national standards

⁷ *Id.* ¶ 15.

⁸ *Id.* ¶ 16.

would not undermine the work that has already been done in a few states, and while some states have initiated such proceedings, many have not done so even though the Commission has required parity since January 1, 1997.⁹ Therefore, it is imperative that the Commission establishes binding national performance measurements and standards. The Commission should not wait to see if each state acts on its own, but should instead take the leadership role on this issue and develop an adequate set of minimum binding national performance standards that individual states may choose to supplement. Otherwise, some states may choose not to adopt any requirements, leaving the CLECs with no way of monitoring the ILECs' performances in those states. National uniform performance standards are the most efficient means of rulemaking because both CLECs and ILECs can more easily make "apples to apples" comparisons of OSS provisioning than with various state rules. Standardized reporting formats and reporting intervals would make the process of reporting on the several performance categories less costly and time-consuming for all parties involved.

LCI refers the Commission to the National Association of Regulatory Utility Commissioners' (NARUC) Floor Resolution No. 5 on Operations Support Systems Performance Standards adopted on November 11, 1997.¹⁰ LCI believes the states have clearly requested in this resolution that the FCC develop appropriate performance categories and measurement methodologies. National performance standards are consistent with such requests because these rules would provide the states with flexibility to supplement the Commission's rules by establishing more specific standards.

⁹ *Id.* ¶ 4.

Additionally, the California Public Utility Commission (CPUC) has pointed out the efficiency benefits of a nationally coordinated system of rules:

[T]he CPUC recognizes that in many cases, including California's, [ILECs'] existing OSS functions serve more than one state. These carriers would prefer to develop a single set of OSS functions and standards for competitors, regardless of the state from which the competitors access the ILECs' OSS functions.¹¹

Georgia is the only state we are aware of that has issued final rules on OSS performance measurements and reporting requirements. Georgia's new OSS order is an illustration of the problems that may arise if each of the fifty states adopt varying OSS performance standards and reporting requirements. The Georgia order does not require any disaggregation of performance results by product, by order activity or by geography.¹² This differs significantly from the level of detail of OSS data contemplated by the Commission in the NPRM. The Commission states "we believe that only detailed performance measurements will ensure that incumbent LECs collect appropriate data and disaggregate the data in a manner that permits meaningful comparisons between the incumbent LEC's own operations and those of the competing carriers."¹³ Because the Georgia order requires less detailed data; however, competing carriers and regulatory agencies will likely have more difficulty analyzing such data to determine OSS compliance. Furthermore, although a few other states have initiated proceedings aimed at developing OSS requirements, many states are embroiled in Section 271 proceedings

¹⁰ NARUC Convention Floor Resolution No. 5, "Operations Support Systems Performance Standards" (adopted by the Exec. Comm. on November 11, 1997).

¹¹ Comments of the People of the State of California and the Public Utilities Commission of the State of California on Petition for Expedited Operations Support System Rulemaking at 3 (CPUC Comments).

¹² *Performance Measurements for Telecommunications Interconnection, Unbundling and Resale*, Georgia Public Service Commission Order, Docket 7892-U (issued May 6, 1998).

¹³ NPRM ¶ 37.

without the benefit of the "apples to apples" OSS data to assess the Regional Bell Operating Companies' (RBOCs') long distance applications.

C. The FCC Has the Jurisdictional Authority To Adopt National Binding Rules.

The Eighth Circuit decision in *Iowa Utils. Bd. v. FCC*¹⁴ does not undermine the Commission's authority to establish the type of performance measurements described in the NPRM. To the contrary, the Court's decision reaffirms such authority by upholding the Commission's regulations that implement the statutory requirement for nondiscriminatory access to unbundled network elements and resale services. Specifically, the Eighth Circuit expressly upheld the FCC's authority under Section 251(d)(2) to define network elements.¹⁵ The Court affirmed the Commission's determination that OSS is an unbundled element¹⁶ and the Commission's rules adopted under Section 251(c)(4)(B) "regarding the [ILECs'] duty not to prohibit, or to impose unreasonable limitations on, the resale of telecommunications services."¹⁷ Thus, the Commission possesses clear authority to establish OSS performance standards that would provide the objective OSS measurement data that is vital to ensuring parity of access.

Without clear, concise performance measurements and reporting requirements, regulatory agencies will not have the capability to determine whether the ILECs are fulfilling their nondiscrimination obligations under the Act. OSS performance standards would serve to define parity and demonstrate that ILECs are able to support competitive market entry in a stable, reliable, and nondiscriminatory manner. The Eighth Circuit

¹⁴ *Iowa Utils. Bd. v. FCC*, 120 F.3d 753 (8th Cir. 1997).

¹⁵ *Id.* at 802 n.23.

¹⁶ *Id.* at 808.

decision upheld FCC regulations that mandate precisely what LCI and other CLECs have been seeking in order to obtain equal access to ILECs' OSS.

D. ILEC Claims That Such National Standards Are A Burden Are Unfounded.

LCI does not support the FCC's suggestion that uniform performance standards and reporting requirements may impose an undue burden upon the ILECs. Although the ILECs argue that performance measurements would be unduly burdensome, Michael J. Friduss, a former ILEC executive for Illinois Bell, has authoritatively put that notion to rest:

Over the past 120 years, telephone companies have developed extensive measures of customer service. These performance measures have generally served two purposes: (1) to allow for the comparison of performance between managers, territories, organizations, and companies, and (2) to provide regulators with indicators of potential problems. These measures cover all areas of customer-affecting performance, including customer care, provisioning, repair, billing, and network maintenance. Regulatory requirements notwithstanding, these performance measures comprise a key indicator of management success. Objectives are set, data is gathered, reports are published, and results become part of the corporate, organizational, and individual success determination.¹⁸

Furthermore, LCI believes that national performance measurements and reporting requirements would save both time and money and lighten the burden to the ILECs because their back-office and computer tracking systems could be set up to measure the same items in the same way in every state in their service territory. Moreover, because the ILECs' OSS are typically regional systems, uniform measurements and requirements

¹⁷ *Id.* at 802 n.23. See also CPUC Comments at 5 (subsection 251(d)(1) authorizes the Commission to establish regulations to implement the requirements of Section 251).

¹⁸ Affidavit of Michael J. Friduss - South Carolina on Behalf of the U.S. Department of Justice, at 6.

would be the most efficient way for them to track their OSS performance. Uniform measurement categories and methodologies are also essential for CLECs to manage and evaluate the ILEC reports they receive. Without such uniformity, many CLECs that do business in multiple jurisdictions will be greatly burdened by analyzing reports that differ from ILEC to ILEC and state to state. Uniform reporting mechanisms would also allow state commissions, the FCC, CLECs and ILECs to “speak the same language” on the subject of performance standards. In short, LCI believes that national performance standards will ease the burden of ILECs and CLECs transacting business and the burden of the Commission, the state commissions, the Department of Justice as these agencies evaluate OSS compliance for Section 271 applications.

III. Proposed Performance Measurements And Reporting Requirements

LCI generally supports the Commission’s proposal with respect to the six performance categories discussed in Section IV.B. and the reporting procedures discussed in Section V of the NPRM. These sections are valuable contributions and will help clarify what is needed to measure whether an ILEC has met its duty to provide OSS functions in compliance with the Act and the *Order*.

LCI agrees with the scope of reporting proposed by the Commission.¹⁹ Specifically, an ILEC should report separately on its performance as provided to (1) its own retail customers; (2) any of its affiliates that provide local service; (3) individual competing carriers; and (4) competing carriers in the aggregate. This will allow a competing carrier to assess the quality of service it receives compared to that of an

¹⁹ NPRM ¶ 39.

ILEC's own service and that of other CLECs. However, LCI disagrees with the Commission's proposal that only carriers that already receive services or facilities through an interconnection agreement or under a statement of generally available terms (SGAT) should receive these reports.²⁰ Carriers that receive services or facilities through resale agreements or an ILEC's tariff should also receive such reports in order to monitor the OSS performance they receive. Competing carriers should not be forced to sign an interconnection agreement or utilize the SGAT in order to receive such vital information.

With regard to the geographic level of reporting, LCI supports the Commission's recommendation that the reporting level should be based on relatively small geographic areas.²¹ In this way, ILECs will be unable to discriminate between the OSS provided in different geographical areas and then conceal such varying performances within a larger statewide reporting area. Therefore, LCI supports reporting on the basis of metropolitan statistical areas ("MSAs"), where such areas are relevant, or otherwise on the basis local access and transport areas (LATAs).

LCI maintains that each ILEC should submit at least monthly reports on its OSS performance to the CLECs with which it is dealing, to the Commission, and to the state commissions with jurisdiction. These monthly reports will enable CLECs to track performance data over time and compare it to the performance received by the ILECs and the CLECs on average. Additionally, monthly data submitted to the FCC and state commissions will guarantee that regulatory agencies remain informed of each ILEC's OSS performance. Furthermore, state commissions will be able to take appropriate

²⁰ *Id.* ¶ 106.

²¹ *Id.* ¶ 38.

corrective action where necessary, upon a finding that an ILEC's actual performance intervals are less than reasonable.

LCI supports the Commission's proposal to establish a clearinghouse where ILECs would file all reports. If all reports were posted on the Internet, all carriers would be able to easily access the information. This would allow all carriers and state commissions to assess the quality of service provided to each carrier in each state. The Commission suggests that this information may be confidential so an ILEC "may not wish to divulge measurement results relating to the provision of services to itself or its local exchange affiliates." This information, however, is exactly what must be divulged in order for CLECs to assess the quality of service that an ILEC provides. Furthermore, by providing information about each CLEC individually, other CLECs can determine if they are receiving nondiscriminatory access equal to that provided to other individual CLECs.

Additionally, competing carriers should have access, upon request, to the underlying data used to obtain the performance measurement results in order to verify those results or evaluate the ILEC's performance in other ways.²² ILECs would not be unduly burdened by having to provide this data upon request. Because the ILECs must generate this data in order to obtain the results, no further data compilation is required, and the ILEC must merely furnish such data to the requesting CLEC.

²² *Id.* ¶ 34.

IV. Enforcement Mechanisms

The Commission suggests that it is premature to propose model enforcement mechanisms for violations of OSS requirements;²³ however, the myriad of ILEC anti-competitive behaviors and roadblocks to competitive entry indicates the Commission should consider adopting such mechanisms now. In fact, such mechanisms may be the only way to force ILECs to comply with their OSS obligations because the incentive of receiving Section 271 approval has not proved to be enough for the RBOCs to comply. The Commission has the authority under Section 208 to enforce its OSS requirements, thus it should adopt meaningful remedies now before any RBOC receives Section 271 approval.

LCI reaffirms its support for the remedies proposed in the LCI/CompTel Petition and urges the Commission to consider those remedies in a timely manner. Most importantly, compliance with the OSS requirements in Section 251, 252, and 271 and in the Commission's *Order* must be a condition for receiving *and retaining* Section 271 approval. Specifically, once an RBOC receives approval to enter the in-region long distance market, the Commission should continue to monitor its OSS performance and impose penalties, such as fines, CLEC credits, suspension of marketing, and ultimately rescission of that approval, if the RBOC's provision of OSS to CLECs falls below that it provides to itself or its affiliates. LCI believes that the threat of monetary penalties alone will not provide enough incentive for the RBOCs to maintain compliance; therefore, the Commission should consider imposing the ultimate consequence on a non-complying RBOC by revoking its in-region long distance approval.

V. Conclusion

With the passage of the Telecommunications Act two years ago, Congress intended to eliminate barriers to competition and to prevent the formation of obstacles that would impede competition. Unfortunately, since the Act was passed, there has been rampant litigation rather than competition in the local telecommunications marketplace. LCI is committed to working towards the common goal of safeguarding and promoting the interests of the American consumer by complying with the Act and by focusing on eliminating the disparity which has emerged between CLECs and the ILEC monopoly companies.

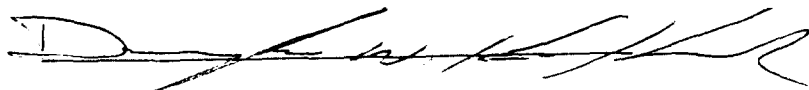
LCI, therefore, urges the Commission to adopt national performance standards and reporting requirements to ensure that there is a sufficient base from which the CLECs can launch effective local competition. LCI believes that national performance standards are essential to enforcing the Act's requirement that the ILECs to open the local exchange markets to competitors. Additionally, the lack of national performance standards and reporting requirements will affect the Commission's, state commissions', and Department of Justice's capacities to evaluate Section 271 compliance. Without reporting requirements, the agencies will not be equipped for rigorous assessment of OSS parity unless a particular state has passed its own reporting requirements. Therefore, if the Commission decides not to adopt national performance standards at this time, LCI urges

²³ *Id.* ¶ 130.

that, at a minimum, it set mandatory reporting requirements for the proposed performance measurements.

Respectfully submitted,

LCI INTERNATIONAL TELECOM CORP.

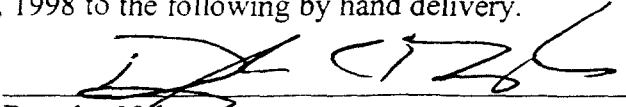
A handwritten signature in dark ink, appearing to read 'Anne K. Bingaman', written over a horizontal line.

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Dated: June 1, 1998

CERTIFICATE OF SERVICE

I, Douglas Nelson, do hereby certify that copies of the foregoing Comments of LCI International Telecom Corp. for the Performance Measurements and Reporting Requirements for Operations Support Systems, Interconnection, and Operator Services and Directory Assistance, CC Docket No. 98-56, RM 9101 were served this 1st day of June, 1998 to the following by hand delivery.


Douglas Nelson

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